

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 25-23025-CV

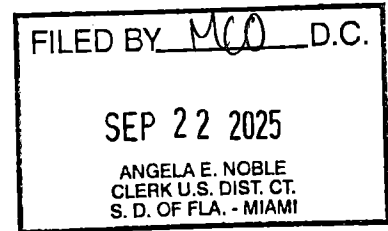
RUBIN YOUNG, SYBEL W. LEE, KEITH
WILSON, WILLIE A. THOMAS,
on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

DONALD J. TRUMP, PAM BONDI, SCOTT
HUNTER, RON DESANTIS, JAMES UTHMEIRE,
DANIELLE LEVINE CAVA, et al.,

Defendants,



**PLAINTIFF'S MOTION FOR CLERK'S ENTRY OF DEFAULT AND A MOTION FOR
DEFAULT JUDGMENT AGAINST DEFENDANT MAYOR DANIELLA LEVINE CAVA**

COMES NOW, Plaintiff, **Rubin Young**, respectfully moves for entry of default by the Clerk pursuant to **Federal Rule of Civil Procedure 55(a)** against Defendant Mayor Daniella Levine Cava, and states as follows:

1. Plaintiff served Defendant Mayor Daniella Levine Cava with the Summons and Complaint on **July 23, 2025**. (Proof of Service filed on docket). See Exhibits A thru C.
2. Pursuant to Rule 12(a)(1)(A)(i), Defendant's responsive pleading was due **21 days later, on August 13, 2025**.
3. Defendants did not file an Answer or any Rule 12(b) motion within that deadline. Instead, Defendant filed a **Motion to Quash Service**, which the Court has since **dismissed on September 16, 2025**.
4. As a result of that dismissal, Defendant currently has **no valid responsive pleading on file**, and her deadline to respond has long expired.

5. Because Defendant has failed to plead or otherwise defend, entry of default by the Clerk is now appropriate under **Rule 55(a)**. See Exhibits A thru K.

WHEREFORE, Plaintiff respectfully requests that the Clerk enter a default against Defendant Mayor Daniella Levine Cava for failure to plead or otherwise defend, as provided by Rule 55(a), Fed. R. Civ. P.

Respectfully Submitted on September 19, 2025.

Signature: _____

Rubin Young, Pro Se Plaintiff
14060 SW 258th Street
Homestead, FL 33032
786-847-9111
commtrus@yahoo.com

CERTIFICATE OF COMPLIANCE

I, the undersigned, hereby certify, pursuant to the applicable provisions of the **Federal Rules of Civil Procedure**, including **Rule 5** and **Rule 11**, and in accordance with the **Local Rules of the United States District Court for the Southern District of Florida**, that the foregoing document:

1. **Comply with all formatting requirements**, including:
 - Use of **Times New Roman**, 12-point font.
 - **Double-spaced** text throughout, except for block quotations and footnotes.
 - **One-inch margins** on all sides.
 - Proper paragraph indentation and spacing for ease of readability and judicial review.
2. **Comply with all content limitations and word count restrictions** as set forth in the Local Rules and any applicable Standing Orders of the Court. The total word count for the body of this document, **excluding the case caption, table of contents (if any), signature block,**

certificate of service, and certificate of compliance, is approximately 1,202 **words**, as determined by the word count function of the word processing software used to prepare this document.

3. It was prepared in **good faith** and is submitted in accordance with **Rule 11**, confirming that:
 - The factual contentions have evidentiary support.
 - The legal contentions are warranted by existing law or by a nonfrivolous argument for extending or modifying the law.
 - The document is not presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation.
4. It has been reviewed for **typographical accuracy, proper citation format, and compliance with court filing protocols**, including electronic filing procedures and document security measures.
5. Is submitted as part of the Plaintiffs' continuing effort, as **pro se litigants**, to comply with all procedural obligations while defending **fundamental constitutional, electoral, and civil rights** under both **state and federal law**.

Respectfully Submitted on September 19, 2025.

Signature:

Rubin Young, Pro Se Plaintiff
14060 SW 258th Street
Homestead, FL 33032
786-847-9111
commtrus@yahoo.com

CERTIFICATE OF INTERESTED PARTIES

Pursuant to Local Rule 7.1.1, Southern District of Florida

Plaintiffs **Rubin Young, Sybel W. Lee, Keith Wilson, and Willie A. Thomas**, appearing **pro se**, respectfully submit this Certificate of Interested Parties and state as follows:

Pursuant to **Local Rule 7.1.1**, the following individuals, entities, and public officials are believed to have a financial, political, legal, or otherwise substantial interest in the outcome of this action, or may be affected by any judgment rendered in this case:

Lists

1. **Rubin Young**, Plaintiff
2. **Sybel W. Lee**, Plaintiff
3. **Keith Wilson**, Plaintiff
4. **Willie A. Thomas**, Plaintiff
5. **Donald J. Trump**, Defendant
6. **Pam Bondi**, Defendant
7. **Scott Turner**, Defendant
8. **Governor Ron DeSantis**, Defendant
9. **Attorney General James Uthmeire**, Defendant
10. **Daniella Levine Cava**, Mayor of Miami-Dade County, Defendant
11. **Juan Fernandez-Barquin**, current Clerk of the Court & Comptroller, potentially affected party
12. **Harvey Ruvlin (Deceased)**, former Clerk of the Court, whose office is central to the claims raised
13. **Miami-Dade County Supervisor of Elections**, potentially affected entity
14. **Florida Department of State, Division of Elections**, potentially affected entity
15. **Florida Attorney General's Office**, potentially interested entity in enforcement or interpretation
16. **Any other persons, agencies, or entities** who may be revealed through discovery to have a direct or indirect interest in the claims, remedies, elections, or constitutional enforcement issues arising in this litigation.

This disclosure is made in good faith and based upon the Plaintiffs' current knowledge. Plaintiffs reserve the right to supplement or amend this certificate as additional facts or parties become known through the course of litigation and discovery.

Respectfully Submitted on September 19, 2025.

Signature:

Rubin Young, Pro Se Plaintiff
14060 SW 258th Street
Homestead, FL 33032
786-847-9111
commtrus@yahoo.com

CERTIFICATE OF SERVICE

I hereby certify that on **September 19, 2025**, I caused a true and correct copy of the foregoing document to be served upon all parties and interested persons in accordance with the Federal Rules of Civil Procedure and the Local Rules of this Court, using the following methods of service:

- **Certified U.S. Mail** with return receipt requested, to ensure verifiable delivery and documentation of service.
- **Priority Mail**, where applicable, to ensure expedited service.
- **Email**, where addresses were available and permitted under the applicable rules or prior agreement between the parties.
- **U.S. Mail**, by first-class postage prepaid, to all parties for whom email, or certified mail service was not available or required.
- **Hand delivery or certified mail** to the United States Attorney's Office, as required under Federal Rule of Civil Procedure 4(i)(1) for service upon the United States or its officers or agencies.

The above methods of service were reasonably calculated to provide notice to all parties and comply with all applicable rules governing the service of process.

List of Parties Served:

- Acting United States Attorney Hayden P. O'Byrne, United States Attorney's Office, Southern District of Florida, 99 N.E. 4th Street, Miami, FL 33132
- President Donald J. Trump, The White House, 1600 Pennsylvania Ave NW, Washington, DC 20530
- U.S. Attorney General Pam Bondi, DOJ, 950 Pennsylvania Ave NW, Washington, DC 20530
- HUD Secretary Scott Hunter, 451 7th Street SW, Washington, DC 20410
- Governor Ron DeSantis, The Capitol, 400 S. Monroe St., Tallahassee, FL 32399
- Attorney General James Uthmeire, Office of the Attorney General, State of Florida, PL 01, The Capitol, Tallahassee, FL 32399
- Mayor Daniella Levine Cava, 111 NW 1st Street, Miami, FL 33128

Respectfully Submitted on September 19, 2025.

Signature: _____

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14060 SW 258th Street
Homestead, FL 33032
786-847-9111
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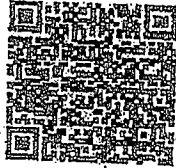
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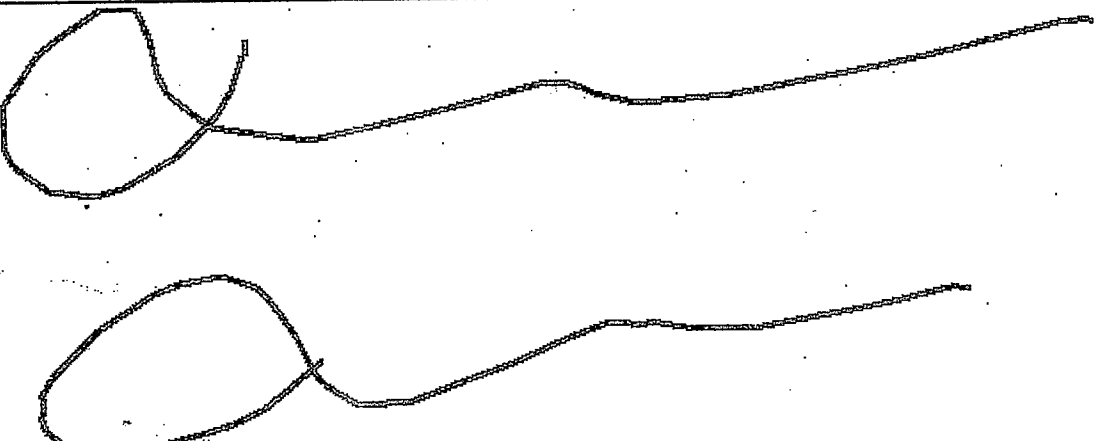
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1460 SW 258th St #308
Homestead FL 33032

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9/19/25